

SP-14877N/



1100 Old Highway 8 NW Minnesota 55112 - Toll Free 1-866-227-0601 - Tel (763) 315-2723 - Fax (760)-315-0399

Attention Duane Cassidy,

PHMSA-2009-0227

We have an operation at 7308 Aspen Lane North Suite # 155 in Brooklyn Park Minnesota and we would like to import non-dot cylinders into our warehouse where they will be emptied of their halon and destroyed. They would be in a sealed container. We originally sent the below February 1, 2009 via e-mail.

As per Subpart H -

a.

1. This is our filing
2. We would like to apply for a exemption to 171.23.3 as outlined for the importation of Non-Dot Cylinders.
3. We are looking for an approval to section above
4. Halon Banking Sytems Reg # 090706 550 0030Q
7308 Aspen Lane North Suite # 155
New Hope MN 55428
Contact Don Connor
e-mail don.connor@halonbankingsystems.us
Phone # 1-866-227-0601
5. Rock Marcone 1-651-636-4320
6. We are importing Non-Dot out of hydrostatic test date cylinders containing bromotrifluoromethane UN # 1009 it is a ozone depleting fire suppressant still used in new aircraft. We would like to import the cylinders empty them and then destroy them.
7. Available on request.

DEPT OF TRANSPORTATION
RECEIVED
JAN 14 2009

b.

1. Transport of Non-Dot out of date cylinders or DOT out of date cylinders
2. We would like to have the approval until December 31, 2011
3. There would be a sealed ocean container, transported by rail to Minneapolis than by truck to our location.

Please contact me for additional information Don Connor 1-866-227-0601 e-mail don.connor@halonbankingsystems.us

Many thanks

A handwritten signature of Don Connor in black ink.

Don Connor
General Manager

Lavalle, Diane (PHMSA)

From: Don Connor [don.connor@halonbankingsystems.us]
Sent: Wednesday, June 17, 2009 3:35 PM
To: Lavalle, Diane (PHMSA)
Subject: RE: DOT application
Attachments: DOT vs BS5045 Comparison.xls

Hi Diane,

We have gotten the information you requested

1. Cylinders are BS5045
2. The cylinders were filled within test period. At the original time of manufacture.
3. See attached spreadsheet.
4. Dohar Qatar to New York

Let me know if this is enough to proceed?

Thanks

Don Connor
General Manager

From: diane.lavalle@dot.gov [mailto:diane.lavalle@dot.gov]
Sent: Wednesday, June 03, 2009 9:24 AM
To: don.connor@halonbankingsystems.us
Subject: DOT application

Hi Don,

This is the additional information I need to proceed with your request.

1. The specifications of the cylinders (the UN standard or foreign specification to which they were built)
2. The date the cylinders were last filled and the test date marked (or a statement that they were filled while still within the test period)
3. A comparison of the cylinders that will be imported to the DOT specification cylinders that are authorized to show that an equal level of safety is maintained.
4. The locations (from where and to where) that the transportation will occur.

I'm not sure how complicated it is for you to get this information. If you are able to provide it, I believe your request will be approved. You can contact me on 202-366-4369 if you'd like to discuss.

Thanks,
Diane LaValle
202-366-4369

6/18/2009

Comparison of DOT-4BW and BS 5045 Pt2:1989 Standards for Welded Section Cylinder

DOT 4BW Specification (49CFR - 178.61)			
Ref:	Characteristic	Requirement	Ref:
(a)	Type	Welded Steel cylinder with longitudinal electric arc welded seam	1
	Size	<1000 lbs	1
	Service Pressure	225 - 500 psig	1
(b) (1)	steel type	Grade 1 - C 0.1-0.2, Mn 1.1-1.6, P<0.04, S<0.05, Si 0.15-0.3, Cu<0.4 Grade 2 - C<0.24, Mn 0.5-1, P<0.04, S<0.05, Si<0.3, Cb 0.01-0.04 Grade 3 - C<0.22, Mn<1.25, P<0.045, S<0.05	6
(b) (2)	head material	C<0.25, Mn<0.6, P<0.045, S<0.050	
	Head type	Ellipsoidal or Hemispherical	10.5
(c)	material ID	suitable method	6.5
(d) (1)	Defects	non allowed that are likely to weaken finished cylinder	17.1
	Finish	smooth uniform surface	14
	Bottom welds	cylinders >18in with exposed bottom welds require a footing	
	Heads	Minimum thickness 90% of sidewall and concave to pressure	10.5.2
(2)	circumferential seams	Electric arc with joggle butt or lap with overlap of 4 times thickness	15.4
(3)	Longitudinal seams	Electric arc with butt weld	15.4
	Method	machine with automated feed	15.2
	Joint	complete penetration, free from undercuts, overlaps, abrupt ridges or valleys	25.3
	Misalignment	<1/6 of sheet thickness or 1/32 inch	15.6
	Joint Gap	<=1.8in tightly butted >1/8in max distance lesser of either 1/2 sheet thickness or 1/32in	15.2
	Joint efficiency	1 = each seam radiographed 0.9 = which one cylinder from lot of 50 is spot radiographed (must include intersection 2in around circumferential weld and 6in along longitudinal) 0.75 = no radiography	25
(4)	Weld Procedures / Operators	Qualified in accordance with CGA Pamphlet C-3	15.2
(e)	Welding of attachments	top and bottoms only with weldable steel C<0.25	
(f)	Wall thickness	OD>6in, t>0.078in	10.3
	Wall stress	Lesser of: $35,000\text{psi}$ or $S = [2P(1.3D^2 + 0.4d^2)]/[E(D^2 - d^2)]$ where D,d=In, P=psig, S = psi, E = Joint efficiency If low carbon used in head - max wall stress 24,000psi	10.1
(g)	Heat treatment	Heat treatment completed after welding completed on cylinder	15.8
(h)	Cylinder Openings	In heads and bases only	

		Provided with adequate fittings, bosses or pads welded to cylinder	
		Threads to gauge and american standard taper pipe threads	
		Straight threads - at least 4 threads engaged, shear strength 10 x test pressure of cylinder	
(l)	Hydrostatic test	At least 1 out of 200 - Volumetric expansion at 2 x service pressure, where permanent expansion <10% of total expansion	18.1.3
		1 out of 500 hydrostatically tested to 4xservice pressure without bursting	21
		Rest examined under pressure of 2 x service pressure and show no defect	20.3
(j)	Physical Test	At least 1 out of 200	18.1
		Body Specimen - longitudinally 90 degrees from weld	Fig.3
		Head Specimen - one if heads same material, one from each if different	Fig.3
		Yield strength at 0.2 permanent strain	19.2 19.3
(k)	Elongation	Elongation >40% for 2in gauge length or 20% for others	6
(l)	Testing of Welds	Tensile Test - Across longitudinal seam, meet requirements of CGA C-3	19.4
		Guided Bend test - Across longitudinal seam, meet requirements of CGA C-3	19.5 19.6
(m)	Radiography	Conform to CGA C-3	25
(n)	Rejected cylinders	If sample fails, 2 further samples taken, if either fails whole lot rejected. Reheat treatment is authorized, repair is authorized	27.2
(o)	Markings	Shoulder, metal plate, neck, valve boss or similar permanent attachment to the top of the cylinder, footring	30
(p)	Inspectors report	178.35 plus type and amount of radiography	5